

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re: Daniel Mayfield) Chapter 13
)
) No. 22-12826
)
Debtor(s)) Judge Timothy A. Barnes

NOTICE OF MOTION

TO: See attached list

PLEASE TAKE NOTICE that on April 13, 2023, at 9:30 am, I will appear before the Honorable Timothy A. Barnes, or any judge sitting in that judge's place, **either** in courtroom 744 of the Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn Street, Chicago, IL 60604, **or** electronically as described below, and present the motion of Debtor [to/for] Incur Debt and Shorten Notice, a copy of which is attached.

All parties in interest, including the movant, may appear for the presentment of the motion either in person or electronically using Zoom for Government.

You may appear electronically by video or by telephone.

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

Meeting ID and passcode. The meeting ID for this hearing is 161 329 5276, and the passcode is 433658. The meeting ID and passcode can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

By: David Freydin

Attorney for Debtor
Law Offices of David Freydin
8707 Skokie Blvd, Suite 312
Skokie, Illinois 60077
847.972.6157

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CERTIFICATE OF SERVICE

I, David Freydin, certify [if an attorney]/declare under penalty of perjury under the laws of the United States of America [if a non-attorney] that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on April 6, 2023, at 5:00 pm.

/s/ David Freydin

[Signature]

Label Matrix for local noticing
0752-1
Case 22-12826
Northern District of Illinois
Eastern Division
Thu Apr 6 16:49:57 CDT 2023

PRA Receivables Management, LLC
POB 41067
Norfolk, VA 23541-1067

U.S. Bankruptcy Court
Eastern Division
219 S Dearborn
7th Floor
Chicago, IL 60604-1702

(p)AMERICAN HONDA FINANCE
P O BOX 168088
IRVING TX 75016-8088

Amex
Correspondence/Bankruptcy
Po Box 981540
El Paso, TX 79998-1540

Barclays Bank Delaware
Attn: Bankruptcy
Po Box 8801
Wilmington, DE 19899-8801

Capital One
Attn: Bankruptcy
P.O. Box 30285
Salt Lake City, UT 84130-0285

Capital One Auto Finance
Attn: Bankruptcy
7933 Preston Rd
Plano, TX 75024-2302

Citibank
Attn: Bankruptcy
P.O. Box 790034
St Louis, MO 63179-0034

Citibank North America
Citibank SD MC 425
5800 South Corp Place
Sioux Falls, SD 57108

First Premier Bank
Attn: Bankruptcy
Po Box 5524
Sioux Falls, SD 57117-5524

(p)FORD MOTOR CREDIT COMPANY
P O BOX 62180
COLORADO SPRINGS CO 80962-2180

LVNV Funding, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

Lendclub Bnk
Attn: Bankruptcy
595 Market Street, Suite 200
San Francisco, CA 94105-2802

LendingClub Bank, NA
P.O. BOX 884268
Los Angeles, CA 90088-4268

Midnight Velvet
Attn: Bankruptcy
1112 7th Avenue
Monroe, WI 53566-1364

OneMain Financial
Attn: Bankruptcy
Po Box 3251
Evansville, IN 47731-3251

(p)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

(p)PENTAGON FEDERAL CREDIT UNION
ATTN BANKRUPTCY DEPARTMENT
P O BOX 1432
ALEXANDRIA VA 22313-1432

Premier Bankcard, LLC
Jefferson Capital Systems LLC Assignee
Po Box 7999
Saint Cloud MN 56302-7999

Silverleaf/orange Lake
8505 W Irlo Bronson Memo
Kissimmee, FL 34747-8217

(p)US BANK
PO BOX 5229
CINCINNATI OH 45201-5229

US Bank/RMS
Attn: Bankruptcy
Po Box 5229
Cincinnati, OH 45201-5229

Daniel Mayfield
8118 S. Sangamon St.
Chicago, IL 60620-3151

David Freydin
Law Offices of David Freydin Ltd
8707 Skokie Blvd
Suite 312
Skokie, IL 60077-2281

Marilyn O Marshall
224 South Michigan Ste 800
Chicago, IL 60604-2503

Patrick S Layng
Office of the U.S. Trustee, Region 11
219 S Dearborn St
Room 873
Chicago, IL 60604-2027

American Honda Finance
Attn: Bankruptcy
Po Box 168088
Irving, TX 75016

Ford Motor Credit
National Bankruptcy Service Center
Po Box 62180
Colorado Springs, CO 80962

PORTFOLIO RECOVERY ASSOCIATES, LLC
POB 41067
Norfolk, VA 23541

Pentagon Federal Credit Union
Attn: Bankruptcy
P.O. Box 1432
Alexandria, VA 22313

(d)Portfolio Recovery Associates, LLC
PO Box 41067
Norfolk, VA 23541

(d)Portfolio Recovery Associates, LLC
c/o Best Buy
POB 41067
Norfolk VA 23541

U.S. Bank National Association
Bankruptcy Department
PO Box 108
Saint Louis MO 63166-0108

(d)Us Bank
Attn: Bankruptcy
P.O. Box 5229
Cincinnati, OH 45201

End of Label Matrix
Mailable recipients 26
Bypassed recipients 0
Total 26

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	
)	Case No. 22-12826
Daniel Mayfield)	
)	Judge Timothy A. Barnes
)	
Debtor(s))	Chapter 13

DEBTOR'S MOTION TO INCUR DEBT AND SHORTEN NOTICE

Daniel Mayfield ("Debtor"), by and through his attorneys, Law Offices of David Freyding, moves this Honorable Court to enter an Order authorizing the Debtor's Motion to Incur Debt, and in support thereof state as follows:

1. The Debtor filed the above captioned voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code on November 3, 2022.
2. This Honorable Court confirmed the Debtor's Chapter 13 Plan on March 16, 2023.
3. The confirmed plan provides for monthly payments of \$100.00 per month, with increases to \$443.00 and \$1,011.00 when the Debtor pays off his 457(b) loans, and will provide at least 34.00% dividend to general unsecured creditors.
4. The Debtor's current vehicle, a 2013 Ford Edge, is unreliable and has required significant repairs in the past 9 months, requiring more than \$7,600.00 in vehicle repair bills and alternative transportation costs. See Exhibit A. At the time of the filing of this motion, the Debtor is in the process of dropping the car off with his mechanic for additional issues with his brakes.
5. The Debtor wishes to purchase a reliable replacement vehicle to prevent future excess expenditures. To that end, the Debtor has received a quote for a replacement vehicle.

See Exhibit B.

6. The Debtor wishes to incur debt to purchase a 2019 GMC Acadia, with an amount financed of \$32,023.25, with an interest rate of 18.99%, and monthly payments of \$748.42 for 72 months.
7. The Debtor's budget can afford this payment by using funds he receives from VA disability.
8. The the Debtor requests that this Motion be heard on shortened notice. The Debtor's current car has a history of requiring expensive repairs and often requires the Debtor to rent replacement vehicles, and his vehicle is currently pending further expensive repairs.
9. That the Debtor is in a position to make Trustee payments as well as the new car payment, have filed in good faith, and intends to complete the plan of reorganization.

WHEREFORE, Debtor, respectfully requests this Honorable Court to enter an Order allowing the Debtor to incur debt to finance the purchase of a vehicle, and for such other and further relief as this Court deems fair and just.

Respectfully Submitted,

/s/ David Freydin
Attorney for Debtor
Law Offices of David Freydin
8707 Skokie Blvd, Suite 312
Skokie, Illinois 60077
847.972.6157